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December 9, 2011

**Via Electronic Filing**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

**Re: Notice of *Ex Parte* Presentation In the Matter of Connect America Fund WC Docket No. 10-90; A National Broadband Plan for Our Future GN Docket No. 09-51; Establishing Just and Reasonable Rates for Local Exchange Carriers WC Docket No. 07-135; High-Cost Universal Service Support WC Docket No. 05-337; Developing an Unified Intercarrier Compensation Regime CC Docket No. 01-92; Federal-State Joint Board on Universal Service CC Docket No. 96-45; Lifeline and Link-Up WC Docket No. 03-109**

Dear Ms. Dortch:

On December 7, 2011, Carol Matthey, the Deputy Bureau Chief of the Wireline Competition Bureau, attended a meeting of the Rural Broadband Alliance (“RBA”) held in Washington, D.C. The list of attendees is attached.

During the course of the meeting, Ms. Matthey participated in a question and answer session during which the RBA participants raised the following matters:

1. Concern that the Commission’s November 18 issued order in the above-referenced proceedings (the “Order”) will limit the opportunity for rural carriers to recover: a) investments and operating costs incurred to provide service in accordance with standards established by the Rural Utility Service, and b) investments and operating costs that have not been deemed unlawful and were incurred in good faith to provide network facilities and services in accordance with Commission goals and objective;
2. Concern that the regression analysis concept adopted by the Commission for rural rate-of-return carriers may not accurately reflect the cost of service of individual companies resulting from company-specific considerations including characteristics such as terrain and topography;
3. Concern that the viability of existing rural competitive local exchange carrier (“CLEC”) services will be threatened as a result of the requirements in the Order to reduce access charges

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without the opportunity for CLECs to recover costs from the transitional recovery mechanism that the Order provides to incumbent price cap and rate of return carriers.

4. Questions related to the new reporting and administrative requirements adopted by the Order including the logistical inability of many carriers to provide annual audited financials by April 1; general comments expressing concern with ensuring that the new requirements do not result in additional and costly administrative burden; and questions regarding whether the Order requires that the filed annual audits address only the operating rural local exchange carrier ("LEC") in instances where a company prepares an annual audit that includes operations unrelated to the LEC.

I am filing this letter electronically with your office for inclusion in the record of each of the above-referenced proceedings pursuant to section 1.1206 of the Commission's Rules. If you have any questions, please do not hesitate to contact me at 202-333-1770.

Sincerely,

s/ Stephen G. Kraskin

Cc: Carol Matthey

# Rural Broadband Alliance Meeting

## December 7-8, 2011

### Attendee List

Last Name	First Name	Company
Adamson	Grier	Hickory Tel
Allen	Ricky	Alenco Communications
Andrews	Dennis	Otelco
Applin	Sid	Alenco Communications
Bennett	Rick	Fail, Inc.
Berberich	Greg	Matanuska Tel. Assn.
Bond	Jim	Public Service
Britton	Janet	EATEL
Bussell	Ray	Alenco Communcations
Cascio	John	Smart City
Dengel	David	Copper Valley Telecom
Derryberry	Brooks	Delta Telephone Co.
Ellis	Wes	Fail, Inc.
Erli	Phil	Ringgold Tel. Co.
Fail	Charles	Fail, Inc.
Fowler	Lester	McDonough Tel. Coop.
Garrigan	Riley	Great Plains
Griffin	Tom	Franklin Tel. Co.
Harber	Kim	Madison
Hutchins	Desda	Loretto Tel. Co.
Jensen	Mick	Great Plains
Johnson	Kenneth	Darien Tel. Company
Johnson	Joan	Big Bend Telephone
Jones	Larry	Chickasaw Tel. Co.
Jordan	Tina	Chariton Valley Tel. Corp.
Judy	Trey	Hargray Comm. Group
Kraskin	Stephen	RBA
McClain	Michael	ComSouth
Merriam	Steve	Arctic Slope Tel.
Nettles	John	Pine Belt
O'brien	Janice	Glenwood
Oliver	Keith	Home Telecom (S. Car.)
Parker	Gordon	Arctic Slope Tel.
Passarella	Marty	Loretto Tel. Co.
Pitts	John	Fail, Inc.
Sanborn	James	Lincolnville Telephone Co.
Scanlan	Arthur	EATEL
Schmidt	Eric	Home Tel. (Ill.)
Sevier	Larry	Rural Tel. Coop.
Shepherd	Brenda	TelAlaska
Siler	Randy	West Wisconsin

**Rural Broadband Alliance Meeting, December 7 – 8, 2011**  
**Attendee List, Page 2**

Last Name	First Name	Company
Smith	Craig	MGW Telephone
Smith	Diane	RBA
Spearman	Ben	PBT
Strecker	Ron	PTCI
Taylor	Scott	MTC
Torrey	Tammy	Franklin Telephone Co.
Tourje	Edward	The North-Eastern Tel. Co.
Turnley	Carl	Kaplan
Vetter	Tracey	The North-Eastern Tel. Co.
Wallin	Mike	Ringgold Tel. Co.
Weikle	Jerry	ERTA